

**REMARKS**

Claims 1-6 and 15-25 are pending in the application. Claims 1-6 and 15-22 were rejected. Claims 1 and 15 have been amended.

***Rejections under 35 U.S.C. § 102***

5        Claims 1-4, 15-18, 21, 23, and 25 were rejected under 35 U.S.C. § 102(e) as being anticipated by Maes et al. (United States Patent number 6,442,251), hereinafter "Maes". Applicants respectfully submit that the claims as amended are patentably distinct from Maes.

10        Regarding claim 1, Maes lacks any teaching regarding establishing a link between a user interface control of the device and commands in the application programs using a control file coupled to a software bus, wherein the application programs comprise application programs that are not native to the device, and wherein the control file is editable to configure the link. For these reasons, Applicants respectfully submit that claims 1 and 15 as amended are not anticipated by Maes.

15        Maes is limited to teaching a phone application for a Palm™ device.

20        A phone application includes a note button. During a call, when the note button is pressed, a note entry screen is presented to a user. The note entry screen is pre-populated with information already known about the phone call (number of caller, number dialed, name of caller, name of person called, etc.). The know [sic] information is retrieved from network data, including phone number and caller id for incoming calls, and the number dialed for outgoing calls, each in conjunction with the user's address book. The user completes the note entry screen including any notes the user wishes to make regarding the phone call. Upon completion  
25        of the note, if an address book entry has not been made or is incomplete, an address book entry screen is presented to the user to make or complete an entry for the caller/person called. The phone application runs on a PDA having telephone capabilities. (Abstract, Emphasis added).

30        Maes at least lacks any teaching or suggestion regarding a control file as claimed or using a control file as claimed. For this reason alone, claim 1 is not anticipated by Maes. Claims 2-6 and 22-23 depend, directly or indirectly, from claim 1 and include further limitations thereon. Therefore, Applicants respectfully submit that these claims are similarly not anticipated by Maes.

Claim 15 includes a memory in which is storable an object framework, a control file, a plurality of application programs, wherein at least one of the plurality of application programs is not native to the device, and wherein the control file is editable to configure the link. Maes does not teach or disclose such a control file, and therefore, claim 15 is not anticipated by Maes. Claims 16-21 and 24-25 depend, directly or indirectly, from claim 1 and include further limitations thereon. Therefore, Applicants respectfully submit that these claims are similarly not anticipated by Maes.

***Rejections under 35 U.S.C. § 103***

Claims 22 and 24 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Maes. Applicants respectfully submit that claims 22 and 24 would not have been obvious in view of Maes. The office action states:

Maes teaches the plurality of application programs being resident in the phone application (already stored in the device upon startup) and also ones that are downloaded (see column 4, lines 8-30). Maes doesn't specifically state when the configuration of the control file is set. It would have been obvious to one of ordinary skill in the art, having the teachings of Maes before him at the time the invention was made to allow for setting the control file at both startup and after events that bring in new application that the device didn't have prior knowledge of. (Paragraph 19).

Applicants respectfully disagree that it would have been obvious to one of ordinary skill in the art, having the teachings of Maes before him at the time the invention was made to allow for setting the control file at both startup and after events that bring in new application that the device didn't have prior knowledge of. Maes does not provide any teaching or suggestion of a control file as claimed, much less configuring a control file. Maes does not describe any mechanism for "...resetting the device where new connections between buttons and associated function would need to be establish..." (Office action, paragraph 19). Therefore, one of ordinary skill would find no motivation in Maes to modify Maes to arrive at the claimed invention. For these reasons, Applicants submit that claims 22 and 24 would not have been obvious in view of Maes.

Claims 5, 6, 19, and 20 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Maes in view of Nomura et al. (United States Patent number

6,658,409), hereinafter "Nomura". Applicants respectfully submit that claims 5, 6, 19, and 20 would not have been obvious in view of Maes and Nomura.

The combination of Maes and Nomura simply does not result in creating a plurality of bus listeners as components of the software bus, at least one bus listener of the plurality of bus listeners corresponding to each user interface control, each bus listener having a corresponding address, storing a value listed in the control file in an address listed in the control file, the value and address each associated with the command associated with the user interface control, and a bus listener having the address associated with the command responding to a change in value stored in the address associated with the command by invoking the command. Maes provides no teaching regarding a control file as claimed. Nomura does not supply the deficiencies of Maes. Neither Maes, nor Nomura teach any relationship between a bus listener and an address listed in a control file. For all of these reasons, one of ordinary skill would not have been motivated to combine Nomura with Maes as suggested to arrive at the claimed invention. Applicants therefore respectfully submit that claims 5 and 6, as well as claims 19 and 20, which include further limitations, would not have been obvious in view of Maes and Nomura.

***Comments on Examiner's Response to Arguments***

With reference to Paragraph 25 of the office action, Applicants respectfully disagree that Maes at column 4, lines 30-51, provides the teaching that is stated by the Examiner. Maes does not describe the mechanism by which the results described in the cited passage are brought about. Applicants respectfully submit that teachings that simply are not set out in the reference are improperly being read into the reference. Maes does not teach a control file, or any other mechanism for achieving the described functionality.

With reference to Paragraph 27, Applicants note that the Examiner characterizes Maes as teaching "a second application program (note taking application) being executed in response to a user command (taping [sic] the note key) provided in the first application program (phone application)." Applicants reiterate that Maes does not teach starting execution of a second application program in response to a command of at least one of the control file and the software bus. The Examiner seems to be analogizing a "user command provided in the first application" with "a command of at least one of the

control file and the software bus". These are simply not the same, and are not even analogous. Applicants submit that Maes does not provide any teaching whatsoever regarding a control file, or any other mechanism for achieving the described results. Maes merely describes what a user sees and does and the results of the user's actions.

5 Therefore, Applicant respectfully submits that the claimed invention is patentable over the cited art.

### CONCLUSION

In view of the foregoing Remarks, Applicants respectfully submit that the rejections under 35 U.S.C. § 102 and 35 U.S.C. § 103 have been overcome, and their withdrawal is respectfully requested. Applicants submit that claims 1-6 and 15-25 are in condition for allowance. The allowance of the claims is earnestly requested. If in the opinion of Examiner Bonshock a telephone conference would expedite the prosecution of the subject application, or if there are any issues that remain to be resolved prior to allowance of the claims, Examiner Bonshock is encouraged to call Barbara Courtney at

10 (408) 342-1902.

15

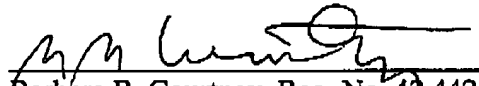
A Petition for Extension of Time Under 37 CFR 1.136(a) is enclosed herewith in duplicate for a three-month extension of time.

20

Respectfully submitted,  
Courtney Staniford & Gregory LLP

Date: November 30, 2005

25

  
Barbara B. Courtney, Reg. No. 42,442  
Tel. 408-342-1902  
Fax. 408-342-1909

30

Courtney Staniford & Gregory LLP  
P.O. Box 9686  
San Jose CA 95157